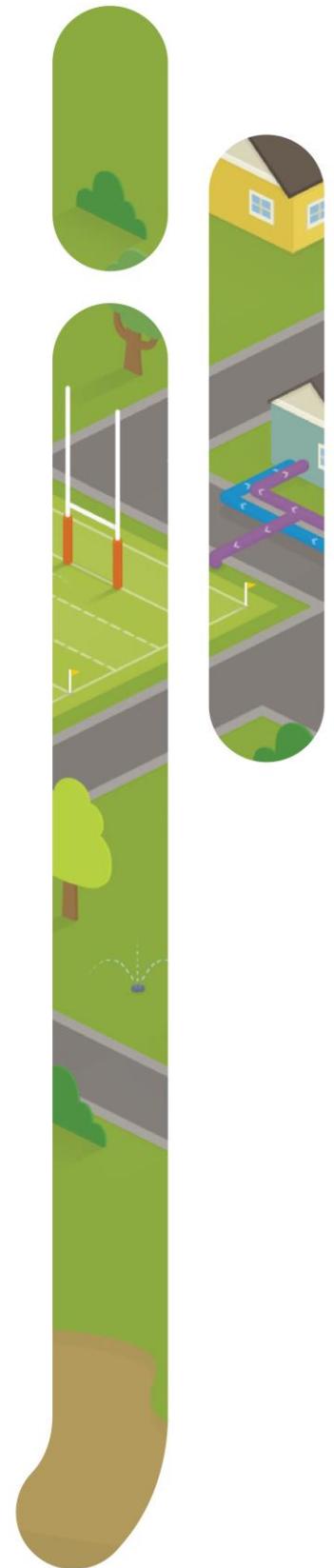


flow

Customer Hardship Policy





Customer Hardship Policy

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How to read this policy

If you need help with this policy and English is not your first language, please contact the Translating and Interpreting Service (TIS) on 13 14 50. This is a free telephone service operating between 8:30am and 5:00pm, Monday to Friday.

Italiano (Italian)

Se hai bisogno di aiuto con questa norma l'inglese non è la tua prima lingua, contatta il servizio di traduzione e interpretariato (TIS) al 13 14 50. Si tratta di un servizio telefonico gratuito operativo dalle 8:30 alle 17:30, dal lunedì al venerdì.

Ελληνικά (Greek)

Αν χρειάζεστε βοήθεια με αυτήν την πολιτική και τα αγγλικά δεν είναι η πρώτη σας γλώσσα, επικοινωνήστε με την Υπηρεσία Μεταφράσεων και Διερμηνείας (TIS) στις 13 14 50. Αυτή είναι μια δωρεάν τηλεφωνική υπηρεσία που λειτουργεί από τις 8:30 π.μ. έως τις 17:30 μ.μ., Δευτέρα έως Παρασκευή.

中文 (Simplified Chinese)

如果您需要本政策方面的帮助，并且英语不是您的第一语言，请致电13 14 50联系翻译和口译服务（TIS）。这是一项免费电话服务，营业时间为周一至周五上午8:30至下午17:30

عربي (Arabic)

إذا كنت بحاجة إلى مساعدة بشأن هذه السياسة واللغة الإنجليزية ليست لغتك الأولى ، فيرجى الاتصال بخدمة في 13 14 50. هذه خدمة (TIS) الترجمة والترجمة الفورية هاتفية مجانية تعمل من الساعة 8:30 صباحًا حتى 17:30 مساءً ، من الاثنين إلى الجمعة.

Tiếng Việt (Vietnamese)

Nếu bạn cần trợ giúp với chính sách này và tiếng Anh không phải là ngôn ngữ đầu tiên của bạn, vui lòng liên hệ với Dịch vụ Thông dịch và Phiên dịch (TIS) theo số 13 14 50. Đây là dịch vụ điện thoại miễn phí hoạt động từ 8:30 sáng đến 17:30 chiều, Thứ Hai đến Thứ Sáu.

Español (Spanish)

Si necesita ayuda con esta política y el inglés no es su primer idioma, comuníquese con el Servicio de Traducción e Interpretación (TIS) al 13 14 50. Este es un servicio telefónico gratuito que funciona entre las 8:30 y las 17:30 horas, de lunes a Viernes.

Promotion of our policy

This Customer Hardship Policy is made publicly available on our website www.flowsystems.com.au and will be emailed or posted to you upon your request, at no charge.

We also promote and publicise our policy by:

- including a message on our bills
- providing a description of our policy on our website and a link to this policy in printable format, and

- including an overview of our policy in our Welcome Pack.

A copy of this policy and the short form customer hardship brochure are both available online and in hardcopy format and will be issued in accordance with the customers preferred contact method at no cost to the customer. If you have not indicated a preference, we will send you a copy by mail.

Customers with a disability can nominate a third party to represent or assist them as required.

Our policy

At Flow, our mission is to create next-generation utilities that enable self-sufficient communities, exceeding the expectations of our customers through sustainable innovation, leadership and smart thinking.

We understand that:

- things change and that, from time to time, you, our residential customers, may experience financial hardship and will need additional assistance and flexibility to pay your bills
- water and electricity are essential services, and
- restriction of water services or disconnection of electricity services following non-payment could have a significant impact on members of your household.

We are therefore committed to identifying residential customers who are experiencing payment difficulties due to hardship.

We understand that anyone can suffer from financial hardship and we are committed to dealing empathetically, respectfully and fairly with customers experiencing hardship.

Our overarching responsibilities

We will:

- in dealing with a customer who is experiencing payment difficulties due to hardship, take into account all of the circumstances of the customer of which they are aware and, having regard to those circumstances, act fairly and reasonably, and
- in a timely manner when it is relevant to do so, including on being contacted by a customer, give a customer clear information about the assistance available to the customer under our customer hardship policy, and
- as soon as practicable, provide a customer who is entitled to receive assistance under our customer hardship policy with that assistance.

Who is this policy for?

If you are a residential customer of Flow Systems Pty Ltd (**Flow**) this policy applies to you.

Introduction

This policy applies to all residential customers who find it hard to pay their energy or water bills due to hardship.

You might experience hardship because of factors like:

- death in the family
- household illness
- family violence
- unemployment
- reduced income.

This policy explains:

- what we will do to help you manage your energy and water bills
- how we consider your circumstances and needs
- your rights as a customer in our hardship program.

You can ask a support person to contact us, such as:

- a financial counsellor
- someone who helps you manage your energy and water bills.

We need your permission to talk to your support person.

What we will do to help you

We will tell you about our hardship program if:

- you tell us you are having trouble paying your bill
- you are referred to our program by a financial counsellor or other community worker
- we are concerned that you may be experiencing financial hardship.

We will recommend you speak to a member of our customer hardship team to help you join our hardship program if you have:

- a history of late payments
- broken payment plans
- requested payment extensions
- received a disconnection warning notice
- received a water restriction notice
- been disconnected for non-payment of your electricity bill
- being restricted for non-payment of your water bill.

We can also support you to join our hardship program if you tell us:

- you are eligible for a relief grant or other emergency assistance
- you have personal circumstances where hardship support may help. For example, death in the family or job loss.

You may have trouble paying your bills for different reasons. Please contact us so we can discuss your individual situation.

Our customer hardship team staff are specially trained to help you with hardship. Our customer hardship team will:

- ask you a few questions about your circumstances
- work out if you can join the hardship program.

We will assess your application for hardship assistance by 10 business days from receipt of application.

We will let you know if you are accepted into our hardship program within 12 business days from receipt of the application.

If you are accepted into our hardship program, we will:

- tell you if you are on the right energy or water plan or if there is a better plan for you
- tell you about government concessions, relief schemes or energy or water rebates you may be able to receive
- give you ideas about how to reduce your energy or water use
- talk to you about a payment amount that suits your circumstances.

We can send you a free copy of our hardship policy.

Payment options

There are different payment options available to hardship customers, including:

- payment plans
- Centrepay.

When you are in our hardship program, we will offer you flexible payment options to suit your individual situation.

To make your payment plan, we will consider:

- how much you can pay
- how much you owe
- how much energy or water we expect you will use in the next 12 months.

This will help us figure out a payment plan that is right for you.

We will offer a payment plan to suit your situation. This will include payments to cover:

- what you owe
- an amount to cover your energy or water use.

Once we agree to a payment plan, we will send you information including:

- who you can contact for more help
- how long the payment plan will go for
- the amount you will pay each time
- how many payments you need to make
- when you need to make your payments (this is also called the frequency of the payments)
- how we worked out your payments.

You can choose to use Centrepay if you are eligible.

Centrepay is a free service you can use to help pay your bills. Centrepay can automatically take an amount of money from your Centrelink payments to go toward energy bills and expenses.

We will see if another energy plan may be better for you. If you agree, we can transfer you to a better energy plan for free.

Depending on the rules in our hardship policy, we may be able to remove some debt, fees or charges you owe.

If you miss a payment, we will contact you to see if you need help. We will contact you by SMS initially with a follow-up email or letter depending on your contact preferences. We will also make best endeavours to contact you by telephone.

What you must do

Tell us if your situation changes and you can no longer make the payments in your plan. We can then review your payment arrangements.

Tell us if your contact details change.

We may stop helping you if you:

- stop making payments under your plan
- do not tell us when your contact details change.

If you have had two payment plans cancelled in the last 12 months because you did not follow your plan:

- we do not have to offer you another plan
- we might disconnect your energy if you are an energy customer
- we might restrict your water if you are a water customer.

Other supports to help you pay your energy bill

Depending on the state or territory you live in, there are other supports to help you pay your energy or water bills.

What we will do

We will tell you about other ways you can get help to pay your energy or water bill, such as:

- government relief schemes
- energy or water rebates
- concession programs
- financial counselling services.

What we need you to do

If you find out you are eligible for these programs, let us know as soon as possible so we can help you.

Our programs and services

As a hardship customer, you can access a range of programs and services to help you:

- a tailored payment plan that extends the normal repayment plan to a maximum of 24 months covering both consumption and arrears and can be offered at varied frequencies
- a tailored plan that extends the normal repayment plan, including an agreed period where repayment may be equal to or lower than their ongoing usage costs
- a temporary payment suspension assessed on a case by case basis. There may be an option to suspend arrears for short-term financial assistance.

What we will do

We will consider your individual situation to find the right programs (e.g. concession programs) or services that meet your needs.

We want to check you have the right energy plan

What we will do

When you join our hardship program, we will talk to you about your energy use and whether you are on the right plan. If we think there is a better energy plan for you, we will:

- explain why the plan is better
- ask if you'd like to transfer to the new plan for free.

We will only talk to you about energy plans we can offer.

We can help you save energy and water

Using less energy or water can save you money.

What we will do

When you join our hardship program, we can give you tips to use less energy or water. This can be different depending on the state or territory you live in.

We will work with you

If you have joined our hardship program, we will not:

- charge late payment fees
- require a security deposit
- make changes to your plan without your agreement. For example, we will not put you on a shortened collection cycle unless you agree first.

Our *Customer Hardship Program* – how do you join and exit

Get in touch

The first step is to contact us as soon as you identify that you are experiencing hardship. If you feel uncomfortable contacting us yourself, you can authorise a third party such as a community agency or financial counsellor to contact us on your behalf.

Early response

Our customer hardship team specialists are trained to identify customers who are vulnerable or may be about to experience hardship.

All bills, reminder notices and disconnection or restriction warnings contain information advising customers to let us know if they are experiencing difficulties and that options are available to assist them with payments. This includes clear information about key dates and any next steps, such as dates by which you need to make a payment or contact us. Remember, it is critical that you keep us informed if your circumstances change, or you think you might have difficulties making your agreed payments.

Assessment process

Our process for assessing the eligibility of a customer who seeks entry into (or re-entry) into our Customer Hardship Program is briefly described as follows. Our customer hardship team specialist will, on a case-by-case basis and having regard to your individual circumstances:

- establish open communication with you to alleviate any immediate concerns regarding the arrears and ongoing management of your account
- discuss your individual circumstances and needs and whether any indicators of possible hardship, including but not limited to the following, are present:
 - customers who let us know they are in financial hardship and are unable to pay their bill by the due date
 - customers advising of recent events that place them in a vulnerable financial position such as job loss, illness, death in the family, family violence, or a sudden change in living circumstances
 - customers receiving assistance from a Financial Counsellor or other advocates
 - customers with limited or no English skills
 - low literacy or numeracy
 - customers that have a history of late payments or failed payment plans
 - temporary loss of income or variable income
 - history of broken payment plans
 - an unexpected essential cost of living expense
 - receiving several bills at once
 - a high bill.

- ask you to provide reasonably available information about and evidence of your hardship and financial circumstances, including (but not limited to) relating to the above indicators of possible hardship
- assess whether your account is active.

You are not able to enter (or re-enter) our *Customer Hardship Program* if you:

- if you have had two payment plans cancelled in the last 12 months because you did not follow your plan
- have a debt incurred via fraudulent or illegal activity
- have been dishonest in describing your circumstances.

We will complete our assessment of your application for entry (or re-entry) into our *Customer Hardship Program* within 10 business days from receipt of the application and let you know if you are accepted into our *Customer Hardship Program* within 12 business days from receipt of the application. If we decide that you are ineligible for our *Customer Hardship Program*, we will provide you with the reason for our decision.

Ongoing management in our *Customer Hardship Program*

When participating in the *Customer Hardship Program*, a customer hardship service team specialist will monitor your account and:

- ask you some questions, including about what you can afford to pay
- take into account the information available to us, including information you give us about your financial circumstances and whether you are in a situation from which you can recover your financial position, to ensure the most appropriate payment options are provided
- work with you to make sure you understand your regulatory entitlements and are receiving all the government and non-government assistance you are eligible for - this includes concessions, rebates, assisting with applications and referrals for emergency relief such as the Home Energy Emergency Assistance Scheme (HEEAS - QLD) and for other grants that might be available
- with your co-operation, work with you to help you find a sustainable solution to your financial difficulties that aims to set up a realistic payment plan that allows you to cover your ongoing consumption costs, and chip away at your arrears over a set time
- if you don't know what you can afford, and we consider that it would help in your circumstances, refer you to an independent third party such as a financial counsellor or a community welfare organisation for advice
- assist with providing regular updates about how you are progressing towards reducing your energy or water costs
- providing ongoing assessment of the success of the payment plan to ensure it is suited to your immediate financial capabilities
- monitoring payments and balances to avoid the accumulation of arrears.

Your obligations

Whilst you are participating in our *Customer Hardship Program*, your obligations are to:

- keep us informed of any relevant changes to your circumstances
- cooperate with us openly, honestly and respectfully
- respond to our attempts to contact you in a timely manner
- work with us towards ensuring you stick to sustainable usage and repaying the account debt and
- make all scheduled repayments on time and in full.

Our obligations

Whilst you are participating in our *Customer Hardship Program*, our obligations are to:

- if you are an energy customer, not disconnect your electricity supply, or, if you are a water customer, not restrict your water supply
- not pursue debt collection actions
- work with you empathetically, respectfully and fairly and
- maintain contact.

Payment Methods

Our preferred payment methods are:

- CentrePay – Customers who receive Centrelink benefits are encouraged to use CentrePay
- Direct Debit – If customers in the program are not eligible for CentrePay payments, customers are encouraged to set up direct debit making it easier to keep on top of ongoing payments.

What happens if you miss a payment?

We understand that sometimes it can be tough to keep on track with all your payments. But, it is critical that in order to maintain assistance in our programs, you must make the payments as set out in the payment schedule we send you, or you give us a call before you miss one. We have flexible options available to help you get back on track, such as extending the plan slightly to account for the missed payment or increasing your payments to cover it. In some circumstances, it may be necessary to set up a completely new payment plan that allows you to stick to it in the future.

As mentioned on page 7, we may stop helping you if you:

- stop making payments under your plan
- do not tell us when your contact details change.

If you have had two payment plans cancelled in the last 12 months because you did not follow your plan:

- we do not have to offer you another plan
- we might disconnect your energy if you are an energy customer
- we might restrict your water if you are a water customer.

Exiting our Customer Hardship Program

You can choose to exit our *Customer Hardship Program* at any time by completing your payment plan early and at no cost to you.

Unless you let us know that you are still experiencing financial hardship and require ongoing assistance, your participation in the *Customer Hardship Program* ends if you successfully complete your payment plan and we are confident that you can pay your bills in future.

You may no longer be eligible to remain in our *Customer Hardship Program* if you:

- do not meet your obligations, and
- you fail to agree to a revised payment plan, or
- you have had two payment plans cancelled in the last 12 months because you did not follow your plan.

We will send you a confirmation when you exit the *Customer Hardship Program*, or if you are no longer eligible to participate, and you will be returned to the normal billing and collections cycle.

Working with third party/community agencies

We welcome the opportunity for third party/community agencies to work with us on your behalf. We are able to refer you to Financial Counsellors and Community Welfare Organisations where we think it might be beneficial.

Due to privacy reasons, the third party/community agency will need to provide a signed consent form giving permission to speak with us on your behalf. The consent form is between yourself and the agency, and we would ask the agency to provide a copy of this to us prior to allowing them access to your account. A consent template is available on both Ombudsman scheme (EWON & EWOQ) websites to download or we can provide a template via post free of charge if required.

Disconnection or restriction is our last resort

The disconnection of electricity services or restriction of water services is governed by legislation and is only used as our last resort for collecting outstanding debt. While you are participating in our *Customer Hardship Program* in relation to overdue payments for:

- a water service, we will not restrict your water service or
- an electricity service, we will not disconnect your electricity service.

By law, we are not permitted to disconnect water or wastewater services, however, we may restrict the flow of water.

Flow is a multi-utility services provider of water, electricity and thermal services (i.e. central hot water, cooker gas and air conditioning) and in some cases, we act as the billing agent for the seller of electricity or thermal services. However, please rest assured that missed payment for any particular Flow utility service has no effect on billing or provision of any other Flow utility service that you may also be our customer for. This also means that disconnection of electricity services or restriction of

water services has no effect on the provision of any other Flow utility service. All Flow utility services are provided and managed as distinct from each other.

We are committed to making every reasonable effort to contact you and work with you to ensure that in the event of hardship, your electricity services are not disconnected, or your water services are not restricted. Avoiding disconnection of your electricity service or restriction of your water service is dependent on our mutual cooperation.

If you are removed from the *Customer Hardship Program* as described above, you will be returned to the normal billing and collections cycle. Subject to restrictions under the law, we may then disconnect your electricity service (if the bill is for electricity) or restrict your water service (if the bill is for your water service) as a last resort for overdue payments.

Training

Our customer hardship team members are specifically trained to handle enquiries about our customer hardship policy and hardship program, including to:

- answer customer queries about our customer hardship policy and hardship program
- identify customers experiencing payment difficulties due to hardship
- assist customers experiencing payment difficulties due to hardship.

We regularly review and update our hardship training.

How to contact us

If you are experiencing financial hardship, please:

- call our customer hardship team from 8.30am to 5:00pm Monday to Friday on 1300 123 803; or
- email hardshipteam@flowsystems.com.au and a member of our customer hardship team will respond.

Complaints

If you have a complaint regarding access to or participation in our *Customer Hardship Program*, you can draw our direct attention to this by contacting us on 1300 806 806. Please get in touch and we will try to resolve your issue as quickly as we can.

Once we have received your complaint, we will send you confirmation in writing within 1 business day. Your complaint will be handled with sensitivity and in accordance with our *Complaints and Dispute Resolution Policy* which is available on our website.

Our *Complaints and Dispute Resolution Policy* sets out how we will handle your complaint, and what you can do if you are not satisfied with the resolution. We are committed to treating complaints and disputes confidentially, promptly, equitably, and professionally at no cost to you.

If you are still not satisfied with our response to your complaint you can contact the relevant Ombudsman scheme in the state in which your services are provided. The Ombudsman provides an independent way to resolve complaints and can make decisions based on what is fair and reasonable in the circumstances of each case. Not all states provide Ombudsman schemes to customers of embedded networks and they may refer you to an alternative service. These services are free to customers.

- Energy & Water Ombudsman NSW (EWON) 1800 246 545
- Energy & Water Ombudsman QLD (EWOQ) 1800 662 837

Meeting our obligations

Flow has an established hardship program that has been modified and expanded to ensure the best outcome for our customer and the business. The policy and processes will be reviewed on an ongoing basis as part of Flow's internal compliance program to ensure that Flow meets its obligations with respect to customer hardship in:

- the Retail Law
- the Retail Rules
- the AER Customer Hardship Policy Guideline
- the Flow Customer Hardship Policy.